

## **REMARKS**

Applicant respectfully requests reconsideration of this application as amended. Claims 1-17 are pending in the application. Claims 1-5, 7, 8-13, 15, and 17 have been amended herein. Support for the claim amendments can be found in at least Figures 9-11 and the corresponding detailed description of the Specification. No claims have been added. No claims have been canceled. No new matter has been added. A listing of claims may be found on pages 3-10 of this Response. Figure 4 has also been amended herein as described on page 2 of this Response and illustrated in the attached Replacement Sheet.

### **I. Response to Objections**

The Examiner has objected to the drawings under 37 C.F.R. § 1.84. Regarding the Examiner's contention that "0LL" of Figure 3, for example, should be underlined, Applicant respectfully disagrees. "0LL" is not a reference character, but rather a descriptive text label describing its tile, similar to how "original image tile" is not a reference character as well. For the tile marked "0LL," for instance, the reference character is 120 and is appropriately marked with a lead line. With respect to the arrows of Figure 4, Applicant submits herewith replacement drawings for Figure 4, replacing the arrows for 80<sub>10</sub>, 80<sub>11</sub>, 80<sub>12</sub>, and 80<sub>13</sub> with lead lines without arrows, as suggested by the Examiner. Reconsideration and withdrawal of these objections are respectfully requested.

### **II. Response to Rejections under 35 U.S.C. § 102(b)**

Claims 1, 3, 5, 9, 11, 13, and 17 stand rejected under 35 U.S.C. § 102(b) as being anticipated by "The JPEG 2000 Still Image Compression Standard," IEEE Signal Processing Magazine, Sept 2001, page 36-58 (hereinafter Skodras). Applicant respectfully requests withdrawal of these rejections because the cited reference fails to disclose all of the limitations of the claims. In particular, claim 1 recites:

a distributively storing unit to distributively store the compressed codes that are divided for each hierarchical layer by the hierarchical coding unit, wherein the distributively storing unit comprises:

a first-level physical storing unit to store the compressed codes of the first hierarchical layer; and

a second-level physical storing unit to separately store the compressed codes of the second hierarchical layer from the compressed codes of the first hierarchical layer, wherein the second-level physical storing unit is physically separate from the first-level physical storing unit.

(emphasis added). As described in Applicant's previous response, Applicant respectfully submits that Skodras teaches memory addresses referring to hierarchical layers (e.g., level 0, level 1) and that such memory addresses are of a single storage unit (See e.g., Skodras, Figure 11). The Examiner notes that the claims need not be limited to storing units as separate physical entities and therefore equates the memory address of Skodras with the storing unit of the claims (See Office Action mailed August 20, 2008, pgs. 4-5). However, as amended, the claims explicitly limit the storing units as "a first-level physical storing unit" and "a second-level physical storing unit" (emphasis added). Accordingly, the cited reference's memory addresses of a single storage unit therefore do not disclose the respective separate first-level and second-level physical storage units of the claims. In view of this amendment, the present arguments in the Office Action regarding whether or not the claims should be limited to such interpretation are moot. As such, Skodras fails to disclose all the limitations of the claim.

Given that the cited reference fails to disclose all of the limitations of the claim, Applicant respectfully submits that claim 1 is patentable over the cited reference. Accordingly, Applicant requests that the rejection of claim 1 under 35 U.S.C. § 102(b) be withdrawn. Applicant respectfully submits that claims 3, 5, 9, 11, 13, and 17 are also patentable over the cited reference for similar reasons described above with respect to claim 1.

Accordingly, Applicant respectfully submits that the rejection under 35 U.S.C. § 102(b) has been overcome by the amendments and the remarks. Applicant submits that claims 1, 3, 5, 9, 11, 13, and 17 are now in condition for allowance and such action is earnestly solicited.

### **III. Response to Rejections under 35 U.S.C. § 103(a)**

Claims 2, 4, 7, 10, 12, and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Skodras, in view of U.S. Patent No. 6,070,167 of Qian (hereinafter Qian). Claims 6 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Skodras, in view of U.S. Patent Pub. No. 2002/0091665 of Beek *et al.* (hereinafter Beek). Claims 8 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Skodras, in view of Qian and Beek. Applicant respectfully requests withdrawal of these rejections because the combination of

cited references does not teach or suggest all of the limitations of the claim. Applicant respectfully submits that claim 2 is patentable over the combination of cited references for similar reasons as described above with respect to claim 1. In particular, Skodras fails to disclose a distributively storing unit to distributively store the compressed codes for each hierarchical layer separately by hierarchical layer into a physical storage unit of each of the other electronic equipments. Applicant does not discern any part of Qian that cures the deficiency of Skodras.

Given that the combination of the references fails to teach or suggest all of the limitations of claim 2, Applicant respectfully submits that claim 2 is patentable over the cited references. Accordingly, Applicant requests that the rejection of claim 2 under 35 U.S.C. § 103(a) be withdrawn.

Applicant respectfully submits that claims 4, 7, 10, 12, and 15 are also patentable over the cited reference for similar reasons described above with respect to claim 2. Given that claims 6 and 14 depend from claims 5 and 13, respectively, which are patentable over the cited reference, Applicant respectfully submits that claims 6 and 14 are also patentable over the cited reference. Given that claims 8 and 16 depend from claims 7 and 15, respectively, which are patentable over the cited reference, Applicant respectfully submits that claims 8 and 16 are also patentable over the cited reference. Accordingly, Applicant requests that the rejections of claims 2, 4, 6-8, 10, 12, and 14-16 under 35 U.S.C. § 103(a) be withdrawn.

**CONCLUSION**


Accordingly, Applicant respectfully submits that the objections and the rejections have been overcome by the amendments and the remarks and withdrawal of these rejections is respectfully requested. Applicant submits that Claims 1-17 as amended are in condition for allowance and such action is earnestly solicited.

If there are any additional charges, please charge Deposit Account No. 02-2666 for any fee deficiency that may be due.

Respectfully submitted,  
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Date: 10/15/07

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